

Presentment Date: November 13, 2013  
Time: 12:00 PM  
Objections Due: November 13, 2013  
Time: 11:00 AM

**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Mark A. Kornfeld  
Benjamin D. Pergament  
Karin Scholz Jenson  
Elyssa S. Kates  
Samir K. Ranade

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF PRESENTMENT OF MOTION FOR ISSUANCE OF  
LETTERS OF REQUEST UNDER THE HAGUE EVIDENCE CONVENTION**

**PLEASE TAKE NOTICE** that pursuant to 28 U.S.C. § 1781(b)(2), the Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, and Rule 2004 of the Federal Rules of Bankruptcy Procedure and upon the accompanying motion (the “Motion”),

Irving H. Picard, Trustee, through his undersigned counsel, will present the proposed order annexed to the Motion (the “Order”) to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for signature and entry on **November 13, 2013, at 12:00 PM.**

**PLEASE TAKE FURTHER NOTICE** that objections to the Motion (“Objections”) shall (i) be in writing, (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders, (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and specific grounds therefor, (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York, 10004, (v) be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Benjamin D. Pergament, Esq.; and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq, so as to be received no later than **11:00 AM on November 13, 2013.**

**PLEASE TAKE FURTHER NOTICE** that in the event any Objections are timely served and filed, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

**PLEASE TAKE FURTHER NOTICE** that, unless Objections are timely served and filed, the proposed Order may be signed without a hearing.

The Trustee made no prior request to this Court or to any other court for the relief requested by this Motion.

Dated: New York, New York  
November 4, 2013

Respectfully submitted,

By: /s/ Benjamin D. Pergament  
BAKER & HOSTETLER LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Mark A. Kornfeld  
Benjamin D. Pergament  
Karin Scholz Jenson  
Elyssa S. Kates  
Samir K. Ranade

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and Bernard L. Madoff*